

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. Bank National Association, as trustee,
on behalf of the holders of the Asset
Backed Securities Corporation Home
Equity Loan Trust, Series NC 2005-HE8,
Asset Backed Pass-Through Certificates,
Series NC 2005-HE8

Plaintiff

vs.

Eric Richmond a/k/a Eric H. Richmond
and CitiMortgage, Inc., f/k/a Citicorp
Mortgage, Inc.

Defendant

CIVIL ACTION NO:

COMPLAINT

RE:

66 Back Meadow Road, Nobleboro, ME
04555

Mortgage:

August 9, 2005

Book 3547, Page 230

NOW COMES the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, by and through its attorneys, Doonan, Graves & Longoria, LLC, and hereby complains against the Defendant, Eric Richmond a/k/a Eric H. Richmond and CitiMortgage, Inc., f/k/a Citicorp Mortgage, Inc., as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant 28 U.S.C. § 1332(a)(1) (Diversity) because the Plaintiff and Defendant are citizens of different states and the matter in controversy exceeds the sum or value of seventy-five thousand and 00/100 (\$75,000.00) dollars, exclusive of interest and costs. Any Court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought under 28 U.S.C. § 2201.
2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1) because the object of this litigation is a Note executed under seal currently owned and held by U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities

Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through

Certificates, Series NC 2005-HE8, in which the Defendant, Eric Richmond a/k/a Eric H.

Richmond, is the obligor and the total amount owed under the terms of the Note is Three

Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, plus attorney

fees and costs associated with the instant action; thus, the amount in controversy exceeds the

jurisdictional threshold of seventy-five thousand (\$75,000.00) dollars.

3. Venue is properly exercised pursuant to 28 U.S.C. §1391(b)(2) insofar as all or a substantial portion of the events that give rise to the Plaintiff's claims transpired in Maine and the property is located in Maine.

PARTIES

4. U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8 is a national association with its principal place of business located at 425 Walnut Street, Cincinnati, OH 45202.
5. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is a resident of Brooklyn, County of Kings and State of New York.
6. The Defendant, CitiMortgage, Inc., f/k/a Citicorp Mortgage, Inc. has a principal place of business in Missouri.

FACTS

7. On March 5, 2004, by virtue of a Warranty Deed from Nattjean Property Management, Inc., which is recorded in the Lincoln County Registry of Deeds in **Book 3253, Page 40**, the property situated at 66 Back Meadow Road, City/Town of Nobleboro, County of Lincoln, and State of Maine, was conveyed to Erick Richmond, being more particularly described by the attached legal description. *See* Exhibit A (a true and correct copy of the legal description is attached hereto and incorporated herein).

8. On August 9, 2005, Defendant, Eric Richmond a/k/a Eric H. Richmond, executed and delivered to New Century Mortgage Corporation a certain Note under seal in the amount of \$198,000.00. *See* Exhibit B (a true and correct copy of the Note is attached hereto and incorporated herein).
9. To secure said Note, on August 9, 2005, Defendant, Eric Richmond a/k/a Eric H. Richmond executed a Mortgage Deed in favor of New Century Mortgage Corporation, securing the property located at 66 Back Meadow Road, Nobleboro, ME 04555 which Mortgage Deed is recorded in the Lincoln County Registry of Deeds in **Book 3547, Page 230**. *See* Exhibit C (a true and correct copy of the Mortgage is attached hereto and incorporated herein).
10. The Mortgage was then assigned to U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8 by virtue of an Assignment of Mortgage dated April 18, 2012 and recorded in the Lincoln County Registry of Deeds in **Book 4516, Page 240**. *See* Exhibit D (a true and correct copy of the Assignment of Mortgage is attached hereto and incorporated herein).
11. On April 26, 2021, the Defendant, Eric Richmond a/k/a Eric H. Richmond, was sent a Notice of Mortgagor's Right to Cure, as evidenced by the Certificate of Mailing (herein after referred to as the "Demand Letter"). *See* Exhibit E (a true and correct copy of the Demand Letter is attached hereto and incorporated herein).
12. The Demand Letter informed the Defendant, Eric Richmond a/k/a Eric H. Richmond, of the payment due date, the total amount necessary to cure the default, and the deadline by which the default must be cured, which was thirty-five (35) days from receipt of the Demand Letter. *See* Exhibit E.
13. The Defendant, Eric Richmond a/k/a Eric H. Richmond, failed to cure the default prior to the expiration of the Demand Letter.

14. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the present holder of the Note pursuant to endorsement by the previous holder (if applicable), payment of value and physical possession of the Note in conformity with 11 M.R.S. § 3-1201, et seq., and *Simansky v. Clark*, 147 A. 205, 128 Me. 280 (1929).

15. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the lawful holder and owner of the Note and Mortgage.

16. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, hereby certifies that all steps mandated by law to provide notice to the mortgagor pursuant to 14 M.R.S.A. § 6111 and/or Note and Mortgage were strictly performed.

17. The total debt owed under the Note and Mortgage as of July 25, 2021 is Three Hundred

Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, which includes:

Description	Amount
Principal Balance	\$182,735.92
Interest	\$111,835.74
Late Fees	\$256.84
Total Fees	\$12.55
Escrow/Impound Advance Balance	\$45,252.76
Loan Level Advance Balance	\$5,082.96
Unapplied Funds	\$-109.08
Grand Total	\$345,055.14

18. Upon information and belief, the Defendant, Eric Richmond a/k/a Eric H. Richmond, is

presently in possession of the subject property originally secured by the Mortgage.

19. Citimortgage, Inc. F/K/A Citicorp Mortgage, Inc. is the holder of a mortgage dated

December 17, 1990 recorded in the Lincoln County Registry of Deeds in Book 1664, Page 153 as corrected by a corrective mortgage recorded in Book 2220, Page 153, which upon information and belief has been paid in full and should have been discharged.

COUNT I – FORECLOSURE AND SALE

20. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, repeats and re-alleges paragraphs 1 through 19 as if fully set forth herein.

21. This is an action for foreclosure and sale respecting a real estate related Mortgage and title located at 66 Back Meadow Road, Nobleboro, County of Lincoln, and State of Maine. *See* Exhibit A.

22. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the holder of the Note referenced in Paragraph 8 pursuant to endorsement by the previous holder (if applicable) and physical possession of the aforesaid Note in conformity with Title 11, section 3-1201, et seq. of the Maine Revised Statutes and *Simansky v. Clark*, 147 A. 205, 128 Me. 280 (1929).

As such, Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, has the right to foreclosure and sale upon the subject property.

23. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the current owner and investor of the aforesaid Mortgage and Note.

24. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is presently in default on said

Mortgage and Note, having failed to make the monthly payment due February 1, 2012, and all subsequent payments, and, therefore, has breached the condition of the aforesaid Mortgage and Note.

25. The total debt owed under the Note and Mortgage as of July 25, 2021 is Three Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, which includes:

Description	Amount
Principal Balance	\$182,735.92
Interest	\$111,835.74
Late Fees	\$256.84
Total Fees	\$12.55
Escrow/Impound Advance Balance	\$45,252.76
Loan Level Advance Balance	\$5,082.96
Unapplied Funds	\$-109.08
Grand Total	\$345,055.14

26. The record established through the Lincoln County Registry of Deeds indicates that there are no public utility easements recorded subsequent to the Mortgage and prior to the commencement of these proceedings affecting the mortgaged premises at issue herein.

27. By virtue of the Defendant, Eric Richmond a/k/a Eric H. Richmond's breach of condition, the Plaintiff hereby demands a foreclosure and sale on said real estate.

28. Notice in conformity with 14 M.R.S.A. § 6111 and/or Note and Mortgage was sent to the Defendant, Eric Richmond a/k/a Eric H. Richmond, on April 26, 2021, evidenced by the Certificate of Mailing. *See* Exhibit E.

29. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is not in the Military as evidenced by the attached Exhibit F.

COUNT II – BREACH OF NOTE

30. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset

Backed Pass-Through Certificates, Series NC 2005-HE8, repeats and re-alleges paragraphs 1 through 29 as if fully set forth herein.

31. On August 9, 2005, the Defendant, Eric Richmond a/k/a Eric H. Richmond, executed under seal and delivered to New Century Mortgage Corporation a certain Note in the amount of \$198,000.00. *See* Exhibit B.
32. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is in default for failure to properly tender the February 1, 2012 payment and all subsequent payments. *See* Exhibit E.
33. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the proper holder of the Note and is entitled to enforce the terms and conditions of the Note due to its breach by the Defendant, Eric Richmond a/k/a Eric H. Richmond.
34. The Defendant, Eric Richmond a/k/a Eric H. Richmond, having failed to comply with the terms of the Note and Mortgage, is in breach of both the Note and the Mortgage.
35. The Defendant Eric Richmond a/k/a Eric H. Richmond's breach is knowing, willful, and continuing.
36. The Defendant Eric Richmond a/k/a Eric H. Richmond's breach has caused Plaintiff U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8 to suffer actual damages, including, but not limited to money lent, interest, expectancy damages, as well as attorney's fees and costs.
37. The total debt owed under the Note and Mortgage as of July 25, 2021, if no payments are made, is Three Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, which includes:

Description	Amount
Principal Balance	\$182,735.92
Interest	\$111,835.74
Late Fees	\$256.84

Total Fees	\$12.55
Escrow/Impound Advance Balance	\$45,252.76
Loan Level Advance Balance	\$5,082.96
Unapplied Funds	\$-109.08
Grand Total	\$345,055.14

38. Injustice can only be avoided by awarding damages for the total amount owed under the Note including interest, plus costs and expenses, including attorney fees.

COUNT III – BREACH OF CONTRACT, MONEY HAD AND RECEIVED

39. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, repeats and re-alleges paragraphs 1 through 38 as if fully set forth herein.

40. By executing, under seal, and delivering the Note, the Defendant, Eric Richmond a/k/a Eric H. Richmond, entered into a written contract with New Century Mortgage Corporation who agreed to loan the amount of \$198,000.00 to the Defendant. *See* Exhibit B.

41. As part of this contract and transaction, the Defendant, Eric Richmond a/k/a Eric H. Richmond, executed the Mortgage to secure the Note and the subject property. *See* Exhibit C.

42. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the proper holder of the Note and successor-in-interest to New Century Mortgage Corporation, and has performed its obligations under the Note and Mortgage.

43. The Defendant, Eric Richmond a/k/a Eric H. Richmond, breached the terms of the Note and Mortgage by failing to properly tender the February 1, 2012 payment and all subsequent payments. *See* Exhibit E.

44. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the

Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is the proper holder of the Note, and is entitled to enforce the terms and conditions of the Note due to its breach by the Defendant, Eric Richmond a/k/a Eric H. Richmond.

45. The Defendant, Eric Richmond a/k/a Eric H. Richmond, having failed to comply with the terms of the Note and Mortgage, is in breach of contract.

46. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is indebted to U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8 in the sum of Three Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, for money lent by the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, to the Defendant.

47. Defendant Eric Richmond a/k/a Eric H. Richmond's breach is knowing, willful, and continuing.

48. Defendant Eric Richmond a/k/a Eric H. Richmond's breach has caused Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, to suffer actual damages, including, but not limited to money lent, interest, expectancy damages, as well as attorney's fees and costs.

49. The total debt owed under the Note and Mortgage as of July 25, 2021, if no payments are made, is Three Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69) Dollars, which includes:

Description	Amount
Principal Balance	\$182,735.92
Interest	\$111,835.74

Late Fees	\$256.84
Total Fees	\$12.55
Escrow/Impound Advance Balance	\$45,252.76
Loan Level Advance Balance	\$5,082.96
Unapplied Funds	\$-109.08
Grand Total	\$345,055.14

50. Injustice can only be avoided by awarding damages for the total amount owed under the Note and Mortgage, and for money had and received, including interest, plus costs and expenses, including attorney fees.

COUNT IV – QUANTUM MERUIT

51. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, repeats and re-alleges paragraphs 1 through 49 as if fully set forth herein.
52. New Century Mortgage Corporation, predecessor-in-interest to U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, loaned Defendant, Eric Richmond a/k/a Eric H. Richmond, \$198,000.00. *See* Exhibit B.
53. The Defendant, Eric Richmond a/k/a Eric H. Richmond, is in default for failure to properly tender the February 1, 2012 payment and all subsequent payments. *See* Exhibit E.
54. As a result of the Defendant Eric Richmond a/k/a Eric H. Richmond's failure to perform under the terms of their obligation, the Defendant, should be required to compensate the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8.
55. As such, the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8,

Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is entitled to relief under the doctrine of *quantum meruit*.

COUNT V –UNJUST ENRICHMENT

56. The Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, repeats and re-alleges paragraphs 1 through 54 as if fully set forth herein.
57. New Century Mortgage Corporation, predecessor-in-interest to U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, loaned the Defendant, Eric Richmond a/k/a Eric H. Richmond, \$198,000.00. *See* Exhibit B.
58. The Defendant, Eric Richmond a/k/a Eric H. Richmond, has failed to repay the loan obligation.
59. As a result, the Defendant, Eric Richmond a/k/a Eric H. Richmond, has been unjustly enriched to the detriment of the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8 as successor-in-interest to New Century Mortgage Corporation by having received the aforesaid benefits and money and not repaying said benefits and money.
60. As such, the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is entitled to relief.

PRAYERS FOR RELIEF

WHEREFORE, the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, prays this Honorable Court:

- a) Issue a discharge of the mortgage dated December 17, 1990 and recorded in the Lincoln County Registry of Deeds Book 1664, Page 153 as corrected by a corrective mortgage recorded in Book 2220, Page 153;
- b) Issue a judgment of foreclosure and sale in conformity with Title 14 § 6322;
- c) Grant possession to the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, upon the expiration of the period of redemption;
- d) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, is in breach of the Note by failing to make payment due as of February 1, 2012, and all subsequent payments;
- e) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, is in breach of the Mortgage by failing to make payment due as of February 1, 2012, and all subsequent payments;
- f) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, entered into a contract for a sum certain in exchange for a security interest in the subject property;
- g) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, is in breach of contract by failing to comply with the terms and conditions of the Note and Mortgage by failing to make the payment due February 1, 2012 and all subsequent payments;
- h) Find that the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is entitled to enforce the terms and conditions of the Note and Mortgage;
- i) Find that by virtue of the money retained by the Defendant, Eric Richmond a/k/a Eric H. Richmond has been unjustly enriched at the Plaintiff's expense;
- j) Find that such unjust enrichment entitles the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity

Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, to restitution;

- k) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, is liable to the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, for money had and received;
- l) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, is liable to the Plaintiff for quantum meruit;
- m) Find that the Defendant, Eric Richmond a/k/a Eric H. Richmond, has appreciated and retained the benefit of the Mortgage and the subject property;
- n) Find that it would be inequitable for the Defendant, Eric Richmond a/k/a Eric H. Richmond, to continue to appreciate and retain the benefit of the Mortgage, Note and subject property without recompensing the appropriate value;
- o) Find that the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, is entitled to restitution for this benefit from the Defendant, Eric Richmond a/k/a Eric H. Richmond;
- p) Determine the amount due on said Mortgage and Note, including principal, interest, reasonable attorney's fees and court costs;
- q) Additionally, issue a money judgment against the Defendant, Eric Richmond a/k/a Eric H. Richmond, and in favor of the Plaintiff, U.S. Bank National Association, as trustee, on behalf of the holders of the Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2005-HE8, Asset Backed Pass-Through Certificates, Series NC 2005-HE8, in the amount of Three Hundred Forty-Five Thousand Sixty-Seven and 69/100 (\$345,067.69 Dollars, the total debt owed under the Note plus interest and costs including attorney's fees and costs;

r) For such other and further relief as this Honorable Court deems just and equitable.

Respectfully Submitted,
U.S. Bank National Association, as trustee, on
behalf of the holders of the Asset Backed
Securities Corporation Home Equity Loan
Trust, Series NC 2005-HE8, Asset Backed
Pass-Through Certificates, Series NC 2005-
HE8,
By its attorneys,

Dated: July 29, 2021

/s/Reneau J. Longoria, Esq.
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